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19 *Attorneys for Plaintiffs*

20 UNITED STATES DISTRICT COURT

21 DISTRICT OF NEVADA

22 ALICIA INES MOYA GARAY, JUAN  
23 JAIME LOPEZ-JIMENEZ, and  
24 ARRIBA LAS VEGAS WORKER  
25 CENTER,

Plaintiffs,

26 vs.

27 CITY OF LAS VEGAS, a municipality;  
28 MICHELE FREEMAN, in her official  
capacity as City of Las Vegas Chief of  
Department of Public Safety;  
BANANTO SMITH, in his individual  
capacity and official capacity as Deputy  
Chief of Detention Services;

Defendants.

Case No. 2:20-cv-00119-GMN-EJY

STIPULATION AND ~~PROPOSED~~ ORDER  
TO EXTEND DISPOSITIVE MOTIONS  
DEADLINE  
(SEVENTH REQUEST)

**STIPULATION AND [PROPOSED] ORDER TO EXTEND DISPOSITIVE MOTIONS  
DEADLINE**

Pursuant to LR IA 6-1 and LR 26-3, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend the Dispositive Motions Deadlines in the above-captioned case. Plaintiffs Alicia Ines Moya Garay, Juan Jaime Lopez-Jimenez, Arriba Worker Center Las Vegas (“Plaintiffs”) and Defendants City of Las Vegas, *et al.* (“Defendants”) stipulate and respectfully request a ninety-day extension of the parties’ deadline for the filing of dispositive motions. In support of this Stipulation and Request, the parties state as follows:

## A. DISCOVERY COMPLETED TO DATE

Plaintiffs Alicia Ines Moya Garay and Juan Jaime Lopez-Jimenez (“Plaintiffs”) and Defendants City of Las Vegas, *et al.* (“Defendants”) made their initial disclosures on June 16, 2020. Plaintiffs propounded their First Set of Interrogatories on August 5, 2020. On August 31, 2020, Defendants requested an extension to respond to Plaintiffs’ First Set of Interrogatories, which Plaintiffs granted. On September 2, 2020 Plaintiffs served their First Set of Requests for Admission and Requests for Production of Documents.

On September 10, 2020, Defendants served their responses to Plaintiffs' First Set of Interrogatories. On September 24, 2020, Plaintiffs served their amended First Set of Interrogatories. On October 1, 2020, Defendants served their responses to Plaintiffs' First Set of Requests for Admission. On October 15, 2020, Defendants served their responses to Plaintiffs' First Set of Requests for Production of Documents. On October 20, 2020, Defendants served their responses to Plaintiffs' amended First Set of Interrogatories. On November 5, 2020, Defendants served their First Supplemental Responses to Plaintiffs' First Set of Requests for Production of Documents. On December 18, 2020, Defendants served their Supplemental Responses to Plaintiffs' First Set of Requests for Admission. On December 21, 2020, December 22, 2020, and December 29, 2020, Plaintiffs conducted the depositions of three witnesses employed by the City of Las Vegas.

1           On January, 21, 2021, Defendants propounded their First Set of Interrogatories and First  
 2 Set of Requests for Production of Documents. On February 17, 2021 Plaintiffs requested an  
 3 extension to respond to Defendants' First Set of Interrogatories and First Set of Requests for  
 4 Production of Documents, which Defendants granted. On March 8 and 9, 2021, Plaintiffs served  
 5 their responses to Defendants' First Set of Interrogatories and First Set of Requests for Production  
 6 of Documents.

7           On March 25, 2021, Plaintiffs propounded their Second Set of Interrogatories, Second Set  
 8 of Requests for Admissions, and Second Set of Requests for Production of Documents. On April  
 9 21, 2021, Defendants asked for an extension of time to respond to Plaintiffs' Second Set of  
 10 Interrogatories, Requests for Production, and Requests for Admissions, due to Defendants'  
 11 change in counsel. Plaintiffs agreed to an extension of the response deadline from April 26, 2021  
 12 to May 17, 2021.

13           On May 28, 2021, Plaintiffs provided their expert disclosures under Rule 26(a)(2)(B) to  
 14 Defendants. In June, Plaintiffs conducted 5 depositions of individuals listed on Defendants'  
 15 initial disclosures and 1 witness designated in response to Plaintiffs' notice of 30(b)(6) deposition  
 16 to Defendant City of Las Vegas. The parties completed 2 other depositions in June.

17           The parties completed the exchange of expert disclosures in July and conducted  
 18 depositions of expert witnesses in September. The parties conducted additional fact witness  
 19 depositions in August and September. Discovery closed on September 21, 2021.

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 21 **B. DISCOVERY REMAINING TO BE COMPLETED**

22           The parties in this case have no additional discovery to conduct.

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 24 **C. REASON FOR REQUEST FOR EXTENSION OF DISPOSITIVE MOTION  
 25 DEADLINES**

26           The parties have exhibited diligence in propounding and responding to written discovery  
 27 and conducting depositions.

1           Following the close of discovery, lead counsel for Plaintiffs, Belinda Escobosa Helzer,  
 2 departed from MALDEF and will seek to withdraw as counsel. Plaintiffs require time to replace  
 3 Attorney Escobosa Helzer with an additional attorney who can familiarize themselves with the  
 4 factual record of this case.

5           The current deadline for dispositive motions for the parties in this matter is October 25,  
 6 2021. Because of Plaintiffs' and Defendants' diligence, and because Defendants do not oppose  
 7 the request, the parties demonstrate good and just cause for the extension. The parties  
 8 respectfully request a ninety (90) day extension of the deadline for dispositive motions in  
 9 accordance with the proposed scheduling order below.

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11 **D. PROPOSED SCHEDULE FOR COMPLETING DISCOVERY**

|   |                    |
|---|--------------------|
| 12           1. Initial Disclosures                 | June 16, 2020      |
| 13           2. Amending pleadings / adding parties | December 28, 2020  |
| 14           3. Merits experts' disclosures due     | May 28, 2021       |
| 15           4. Rebuttal experts' disclosures due   | July 8, 2021       |
| 16           5. Discovery Cut-off date              | September 21, 2021 |
| 17           6. Dispositive Motions due             | January 24, 2022   |

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19           Dated: October 14, 2021

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21           MEXICAN AMERICAN LEGAL DEFENSE  
 AND EDUCATIONAL FUND

22           BRYAN SCOTT  
 City Attorney

23           By: /s/ Ernest Herrera  
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7 *Attorneys for Plaintiffs*

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9 IT IS SO ORDERED:  
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11 UNITED STATES MAGISTRATE JUDGE

12 DATED: October 14, 2021